

#60
Exhibits ACP
CA 00105
Defendants Renewed
motion for a Stay and
motion for leave to seek a
Protective order

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.

vs.

C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.

PLAINTIFFS' FIRST SET OF INTERROGATORIES PROPOUNDED
TO DEFENDANT, THE PALESTINIAN AUTHORITY

Your attention is respectfully directed to Fed. R. Civ. P. 33 which requires you to furnish "Such information as is available to the party." Therefore, kindly make inquiry to and/or reference to such documents, business associates, employees, agents and/or servants as will enable you to answer these interrogatories fully and accurately.

Interrogating party requires that within thirty (30) days after service of these written interrogatories, interrogated party shall answer, under oath, the following questions. If affiant cannot answer the following interrogatories in full and complete detail after exercising due diligence to secure the information to do so; so state and answer to the extent possible, specifying affiant's inability to answer the remainder and stating whatever information or knowledge affiant has concerning the unanswered portion.

If any question is objected to on any grounds, state such grounds completely and if said question is only partially objectionable, answer the remainder of the question as fully as above; where knowledge or information in possession of a party is requested, such a request includes knowledge of the parties, agents, representatives, and unless privileged, attorney of interrogated party.

In addition to answering the information called for in each interrogatory, provide the following information separately with respect to each interrogatory answer: (a) the name of each person providing the information upon which the answer is based if different from affiant; (b) identify each document in answering the interrogatory or upon which the interrogatory answer is based. When identifying a document, in addition to the specific means of identification requested in the interrogatory, the following information shall also be furnished: (1) the author and identity of the person who prepared the document; (2) if published, its date of publication; (3) a summary of its contents; (4) its publisher, if any; (5) if not a publication, each person to whom copies were sent, delivered, given and/or disclosed; (6) its present location, and custodian or person who has possession or control over the document.

The word "account" as used herein means any checking, savings, investment, and/or deposit account of any nature and kind in any bank, brokerage or financial institution.

The word "Palestinian Authority" means The Palestinian Authority, Palestine National Authority, Palestinian Interim Self-Government Authority, Palestinian Legislative Counsel, General Intelligence Services, Preventative Security Services, Palestinian Police, Palestinian National Fund, Department of Finance, Palestine Monetary Fund, Joint Investment Fund, Palestinian National Authority Pension Fund, P.E.C.D.A.R., P.C.S.C., P.A., SAMED, Palestine Monetary Authority, P.M.A., Investment Department, and any agency, instrumentality, and/or subdivision of same.

The word "HAMAS" refers to the Islamic Resistance Movement (a.k.a. "Harakat Al-Muqawama Al Islamiyya") including the Dawa and military wing.

The word "support" refers to cash, any grant, benefit, gift, gratuity, loan, scholarship, mortgage, honorarium, award, prize, and anything of material value.

The interrogatories are as follows:

1. Please state your name, address, social security number and/or identification number, position with defendant, Palestinian Authority, length of service, and the name of each individual (other than counsel) you consulted or obtained information from in answering this set of interrogatories.

2. Please describe any actions taken by the Palestinian Authority to investigate and arrest individuals responsible for the murder of the Ungars with reference to:

- a. which person(s) and/or agency(ies) were responsible for investigating the Ungar murder;
- b. the results of any investigation;
- c. whether the investigation results were reduced to a written report;
- d. the custodian of said report;
- e. whether the Palestinian Authority received any information and assistance from the United States or the Israeli Police or other agency regarding the murder.

3. Please state the names of all Palestinian Authority officials, police officers, security service agents, employees, prosecutors or investigators who took any investigative measures, conducted interviews or any interrogations, made any inquiries, gathered any evidence, conducted any forensic examinations, carried out any research or maintain any files or data bases concerning the investigation of the murder of Yaron and Effi Ungar.

4. Please state the names of all suspects, witnesses, informants or residents of the Palestinian Authority who have been summoned, detained, questioned, investigated, canvassed, had their movements, phones or mail monitored, were ordered by any court or any government agency to appear, or who are sought by law enforcement officials either in the Palestinian Authority, in Israel or abroad in connection with the murder of Yaron and Effi Ungar or who are believed to have evidence and/or information, either material and/or circumstantial concerning these murders.

5. Please state the names, dates and the circumstances of the detention, arrest or imprisonment of all individuals by the Palestinian Authority for carrying out terror attacks against American and/or Israeli citizens.

6. Please state the names and locations of the facilities at which HAMAS members were quartered, interned or detained by the Palestinian Authority.

7. Regarding Abdel Rahman Ismail Abdel Rahman Ghanimat, Jamal Abdel Fatah Tzabich Al Hor, Raed Fakhri Abu Hamdiya, Ibrahim Ghanimat, and Iman Mahmud Hassan Fuad Kafishe, please state all communication by the Palestinian Authority officials and agents concerning:

- a. preparation and planning for the murder of Yaron and Efrat Ungar;
- b. evading Israeli authorities following the murder of Yaron and Efrat Ungar;
- c. the details of the communication.

8. Please state all assistance provided by the Palestinian Authority to Abdel Rahman Ismail Abdel Rahman Ghanimat, Jamal Abdel Fatah Tzabich Al Hor, Raed Fakhri Abu Hamdiya, Ibrahim Ghanimat, and Iman Mahmud Hassan Fuad Kafishe:

- a. prior to June 9, 1996;
- b. subsequent to June 9, 1996.

9. Regarding all meetings between Mohammed Dahlan and Mohammed Dief, please state:

- a. date of meetings;
- b. location;
- c. nature of discussion and topic.

10. Please fully describe the relationship between the Palestinian Authority and the newspaper Al-Hayat Al-Jadida with reference to:

- a. whether, and to what extent, the Palestinian Authority provides financial support;
- b. the nature and level of control exercised by the Palestinian Authority over Al-Hayat Al-Jadida;
- c. whether any editor, publisher, staff member, or employee of Al-Hayat Al-Jadida is or has been an employee of the Palestinian Authority.

11. Please state the names of all employees of Al-Hayat Al-Jadida that have been paid by the Palestinian Authority since 1993, including:

- a. job title;

- b. salary;
- c. dates of employment.

12. Please fully describe the relationship between the Palestinian Authority and the Voice of Palestine radio network with reference to:

- a. whether and to what extent the Palestinian Authority provides financial support;
- b. the level of control exercised by the Palestinian Authority over the Voice of Palestine;
- c. whether any editor, writer, news presenter, program host, reporter, disc jockey, tape editor, on-air personality, radio technicians or salesman is or has been an employee of the Palestinian Authority;
- d. whether the Palestinian Authority exercises control over the Voice of Palestine's productions and broadcasts.

13. Please fully describe the relationship between the Palestinian Authority and the Palestinian Television (Palestine TV) network with reference to:

- a. whether and to what extent the Palestinian Authority provides financial support;
- b. the level of control exercised by the Palestinian Authority over the Palestine TV;
- c. whether any editor, writer, news presenter, program host, reporter, weather person, tape editor, on-air personality, radio technicians, or salesperson is or has been an employee of the Palestinian Authority;
- d. whether the Palestinian Authority exercises control over Palestine TV's productions and broadcasts.

14. Please state the name of all bureaus, sections, and agencies charged with the responsibility of providing support to individuals and/or their families who are killed, arrested, detained, or imprisoned by Israel or other nations in the course of their armed struggle, acts of defense, attempts at martyrdom or terror attacks against Israel.

15. From 1993 to the present, please state all support paid by the Palestinian Authority to persons, or to the families of persons, who were captured or killed while carrying out, or while attempting to carry out, activities on behalf of HAMAS or any other Palestinian organization.

16. Please describe the specific nature, amounts and duration of the support given to the individuals, their widows, children, parents, sibling or other family members.

17. Please state the names and positions of the individuals, officials, board members, and staff who decide, choose, analyze, investigate or select appropriate individuals or families to receive support.

18. Please state the criteria, standards and considerations employed by the above individuals, officials, board members, and staff in making their decisions, choices, analysis, investigations, selections and determinations concerning who are appropriate individuals or families to receive support.

19. Please state the names and circumstances of all individuals or family members receiving such support, including but not limited to any of the defendants in the instant action, stating for each the amount of support received.

20. Please state the names, circumstances, and amount provided to all HAMAS members or their family members receiving such support.

21. Please state the exact legal status of HAMAS (a.k.a. "Harakat Al-Muqawama Al Islamiyya") in the Palestinian Authority, including but not limited to the following:

- a. whether HAMAS is and has ever been a licensed or registered organization in the Palestinian Authority;
- b. the name of any agency or subdivision of the Palestinian Authority granting any license to HAMAS;
- c. the type of support HAMAS receives from the Palestinian Authority;
- d. whether the Palestinian Authority provides HAMAS with facilities of any type ;
- e. whether HAMAS operates freely;
- f. whether HAMAS is an illegal organization.

22. Please state the exact address of all HAMAS offices, facilities and institutions in areas within Palestinian Authority territory, rule and/or control.

23. Please state the exact amounts and locations of all HAMAS accounts and other assets held by or in any bank, financial institution, subsidiary or agency owned or controlled by the Palestinian Authority.

24. Please identify and describe all agreements entered between the Palestinian Authority and HAMAS, stating :

- a. date of the agreement;
- b. the individuals and official bodies who approved the agreement;
- c. the name, rank and position of the individual who executed the agreement;
- d. the sum and substance of the agreement.

25. Concerning the meeting between Salim Al-Za'nun and Khalid Mash'al in Cairo on December 18 through 21, 1995, please state:

- a. the nature and extent of the discussion between the Palestinian Authority and HAMAS representatives;
- b. the terms of any agreement between the parties;
- c. whether a joint committee was formed subsequent to the Cairo meetings.

26. Concerning the August 1997 National Unity Conference to Confront the Challenge held in Gaza by the Palestinian Authority, please state:

- a. the extent of HAMAS participation in the conference;
- b. whether HAMAS was invited by the Palestinian Authority;
- c. whether HAMAS members and/or representatives attended the conference.

27. Please describe the meeting of March 9, 1997 between Yasser Arafat and HAMAS leaders in Gaza detailing:

- a. the time and exact location of the meeting;
- b. the individuals present;
- c. the sum and substance of the discussion;
- d. who initiated the meeting and the reason the meeting was requested.

28. Please describe in detail all meetings between officials and/or employees of the Palestinian Authority in Sudan and HAMAS operative Mahmoud al-Hindi detailing:

- a. the time and exact location of the meeting;
- b. the individuals present;
- c. the sum and substance of the discussion;
- d. who initiated the meeting and the reason the meeting was requested.

29. Please describe in detail all material and/or financial support provided by officials and/or employees of the Palestinian Authority in Sudan to HAMAS operative Mahmoud al-Hindi.

30. For each international conference, assembly, congress, gathering, seminar and meeting in which representatives and/or delegations from the Palestinian Authority have included members of HAMAS, state:

- a. date and location;
- b. the names of all HAMAS members who participated as members of an official Palestinian Authority delegation.

31. From 1993 to the present, please describe the purpose, substance and nature of each and every meeting and /or official conversation between any official, employee and/or agent of the Palestinian Authority and any official or leader of HAMAS.

32. From 1993 to the present, please describe in detail all material support, assistance or resources of whatever nature and kind provided by the Palestinian Authority to HAMAS and HAMAS officials, operatives and leaders.

33. For each current and former HAMAS operative and/or member employed by the Palestinian Authority since 1993, please state:

- a. name and address;
- b. occupation, rank/position;
- c. length of service;
- d. agency of Palestinian Authority of employment;
- e. salary and benefits;
- f. reason for termination;
- g. nature, type and extent of training provided;
- h. whether said individual was issued and/or permitted to carry a firearm and, if so:
 - i. type of weapon;
 - ii. reason for issuance and/or permission.

34. For each request of the United States government made to the Palestinian Authority to take actions against HAMAS from 1993 to the present, please state:

- a. date of the request;
- b. name and title/position of person making the request;
- c. exact description of the request;
- d. method of request (if written, identify the document);
- e. response of the Palestinian Authority.

35. For each request of the Israeli Government made to the Palestinian Authority to take action against HAMAS from 1993 to the present, please state:

- a. date of the request;
- b. name and title/position of person making the request;
- c. exact description of the request;
- d. method of request (if written, identify the document);
- e. response of the Palestinian Authority.

36. For each request made by the Israeli Government to the Palestinian Authority to surrender for prosecution a HAMAS member, please state:

- a. name of the HAMAS member;
- b. date of Israeli request;
- c. the offense for which the HAMAS member was sought;
- d. action taken by the Palestinian Authority;
- e. current whereabouts of the HAMAS member.

37. For the requests made by the U.S. and Israeli governments to the Palestinian Authority to arrest and imprison HAMAS commander Salah Talachmeh (aka Nasser Salah Talachmeh) please state:

- a. dates of American requests;
- b. dates of Israeli requests;
- c. the allegations and/or charges against Salah Talachmeh cited in the American and Israeli requests;
- d. action taken by the Palestinian Authority against Salah Talachmeh;
- e. current whereabouts of Salah Talachmeh.
- f. the dates on, and locations at which, Salah Talachmeh was questioned, detained, interned or quartered by the Palestinian Authority, and the names of the persons who questioned him.
- g. The sum and substance of any questions posed to Salah Talachmeh by the Palestinian Authority and of Salah Talachmeh's answers to those questions.
- h. the dates on which Salah Talachmeh left and entered any internment or detention facility or barracks operated by the Palestinian Authority.
- i. The names of all persons who visited and/or met with Salah Talachmeh in any internment or detention facility or barracks operated by the Palestinian Authority, and the dates of those visits.
- j. The names of all persons who were interned and/or quartered and/or detained and/or in custody concurrently with Salah Talachmeh in any internment or detention facility or barracks operated by the Palestinian Authority.
- k. The names of all personnel who operated and were employed at any facility or barracks operated by the Palestinian Authority in which Salah Talachmeh was interned, quartered or detained.
- l. Dates of all conversations between Salah Talachmeh and any other person monitored and/or recorded by the Palestinian Authority, and the sum and substance of those conversations.
- m. Dates of all conversations between Salah Talachmeh and any other HAMAS operative, including but not limited to Abdel Rahman Ghanimat, monitored and/or recorded by the Palestinian Authority, and the sum and substance of those conversations.

38. For the requests made by the U.S. and Israeli governments to the Palestinian Authority to arrest and imprison HAMAS operative Ibrahim Ghanimat please state:

- a. dates of American requests;
- b. dates of Israeli requests;
- c. the allegations and/or charges against Ibrahim Ghanimat cited in the American and Israeli requests;

- d. action taken by the Palestinian Authority against Ibrahim Ghanimat;
- e. current whereabouts of Ibrahim Ghanimat.
- f. the dates on, and locations at which, Ibrahim Ghanimat was questioned, detained, interned or quartered by the Palestinian Authority, and the names of the persons who questioned him.
- g. The sum and substance of any questions posed to Ibrahim Ghanimat by the Palestinian Authority and of Ibrahim Ghanimat's answers to those questions.
- h. the dates on which Ibrahim Ghanimat left and entered any internment or detention facility or barracks operated by the Palestinian Authority.
- i. The names of all persons who visited and/or met with Ibrahim Ghanimat in any internment or detention facility or barracks operated by the Palestinian Authority, and the dates of those visits.
- j. The names of all persons who were interned and/or quartered and/or detained and/or in custody concurrently with Ibrahim Ghanimat in any internment or detention facility or barracks operated by the Palestinian Authority.
- k. The names of all personnel who operated and were employed at any facility or barracks operated by the Palestinian Authority in which Ibrahim Ghanimat was interned, quartered or detained.

39. Please list the name of all Palestinian Authority police and/or security officers who are members of HAMAS and/or Islamic Jihad, stating for each:

- a. name;
- b. agency of employee;
- c. rank/position;
- d. date of employment;
- e. salary;
- f. the type, make and number of firearms or other weapons issued to each such person by the Palestinian Authority;
- g. the nature and type of training provided by the Palestinian Authority to each such person.

40. Please state whether Hamed Bitawa was appointed to an official position in the Palestinian Authority, if so, please state:

- a. who recommended the appointment;
- b. who approved the appointment;
- c. whether it was known by the appointing authority or individual that he was a leader of HAMAS;
- d. the title and nature of the position, and the period of time in which he served in that capacity;
- e. the salary and benefits provided to him.

41. Please state whether Talal Sidr was appointed to an official position in the Palestinian Authority and, if so, please state:

- a. who in the Palestinian Authority was responsible for the appointment;
- b. who approved the appointment;
- c. whether it was known by the appointing authority or individual that he was a leader of HAMAS;
- d. the title and nature of the position, and the period of time in which he served in that capacity;
- e. the salary and benefits provided to him.

42. Please state whether Imad Falooji was appointed to an official position in the Palestinian Authority and, if so, please state:

- a. who in the Palestinian Authority was responsible for the appointment;
- b. who approved the appointment;
- c. whether it was known by the appointing authority or individual that he was a member of HAMAS;
- d. the title and nature of the position, and the period of time in which he served in that capacity;
- e. the salary and benefits provided to him.

43. Please state the name of all HAMAS members who have served in Palestinian Authority governing bodies, indicating:

- a. the individual's position/title/rank within HAMAS;
- b. length of service in HAMAS;
- c. the individual's position/title/rank in the Palestinian Authority;
- d. length of service in the Palestinian Authority.

44. Please state the name of all HAMAS members employed since 1993 in any Palestinian security, police, intelligence or paramilitary force, stating for each:

- a. name and address;
- b. the position, rank and length of service of each such person;
- c. compensation (salary, benefits, etc.);
- d. the type, make and number of firearms or other weapons issued to each such person by the Palestinian Authority;
- e. the nature and type of training provided by the Palestinian Authority to each such person.

45. Since, 1993, please state whether any Palestinian Authority official and/or employee urged and/or requested HAMAS operatives and/or members to leave the West Bank or Gaza Strip in order to avoid arrest, stating:

- a. when each request was made;
- b. name of the requesting individual;
- c. individual to whom the request was made.

46. For the following individuals, Imad Abbas, Abd al-Khader Amar, Raid Bashiti, Adnan al-Gol (a.k.a. Adnan al-Rol), Atef Hamadan, Bassam Issa, Sufian Abu Jadian, Kamal Khalifa, Yasser Yusef Khasin, Salaam Abu Maarouf, Yusuf Malhi, Mahmud A. Sanwar, Abd al-Fatah Sitri, Osama Abu Taha, Imad Falooji, and Sheikh Talal Sidr, please state:

- a. whether he was ever a member of HAMAS;
- b. whether he was ever an employee of the Palestinian Authority and, if so,
 - 1. in what capacity (i.e. job position and title);
 - 2. dates of employment;
 - 3. salary and benefits;
 - 4. whether he is currently employed with the Palestinian Authority;
 - 5. the name of the agency, division, office or department in which he is employed;
 - 6. the type, make and number of firearms or other weapons issued to said individual by the Palestinian Authority;
 - 7. the nature and type of training provided by the Palestinian Authority to each such person.

47. Describe in detail all assistance provided by the Palestinian Authority to Nasser Salah Talachmeh (a.k.a. Salah Talachmeh), Abdel Rahman Ismail Abdel Rahman Ghanimat, Jamal Abdel Fatah Tzabich Al Hor, Raed Fakhri Abu Hamdiya, Ibrahim Ghanimat and Iman Mahmud Hassan Fuad Kafishe, including but not limited to means of transportation, false identity documents, shelter, and safe haven and refuge.

48. For each HAMAS operative and/or member interned and/or imprisoned by the Palestinian Authority from 1993 to the present, please state:

- a. name;
- b. nature of offense/charge;
- c. disposition and prison sentence;
- d. date of internment/imprisonment;
- e. date of release;
- f. reason for release;
- g. whether the prisoner was released prior to the completion of the sentence imposed.

49. Concerning Adnan Jaber Ghul and Muhammed Deif, please state:

- a. whether they are members of HAMAS;
- b. the date(s) the Palestinian Authority incarcerated them;
- c. the reason for each incarceration;

- d. the date(s) each was released from incarceration;
- e. the reason for each release;
- f. whether the release was prior to the expiration of a prison sentence.

50. Please state whether on or about March 10, 1997 Ibrahim Maqadmah was released from a Palestinian Authority prison and, if so, please state:

- a. whether he is a member of HAMAS;
- b. the date(s) the Palestinian Authority incarcerated him;
- c. the reason for his incarceration;
- d. the date(s) he was released from incarceration;
- e. the reason for his release;
- f. whether his release was prior to the expiration of a prison sentence.

51. For each of the following individuals, Nabil Sharihi, Nafez Sabih, Abdel Magid Dudin, please state:

- a. whether they are members of HAMAS;
- b. the date(s) the Palestinian Authority incarcerated them;
- c. the reason for each incarceration;
- d. the date(s) each was released from incarceration;
- e. the reason for each release;
- f. whether the release was prior to the expiration of a prison sentence.

52. For each of the following entities: Palestine National Authority, Palestinian Interim Self-Government Authority, Palestinian Legislative Counsel, General Intelligence Services, Preventative Security Services, Palestinian Police, Palestinian National Fund, Department of Finance, Palestine Monetary Fund, Joint Investment Fund, Palestinian National Authority Pension Fund, P.E.C.D.A.R., P.C.S.C., P.A., SAMED, Palestine Monetary Authority, P.M.A., Investment Department, please state:

- a. legal relationship to the Palestinian Authority;
- b. legal relationship to Palestinian Liberation Organization;
- c. method and level of control exercised by the Palestinian Authority over each organization;
- d. method and level of control exercised by the Palestinian Liberation Organization over each organization.

53. Please state the names, dates, and circumstances of any indictment and prosecution of any individual by the Palestinian Authority for carrying out terrorist attacks.

54. Please state the names of all courts, tribunals, assizes, councils, forums or administrative bodies that have conducted trials, prosecutions, hearings or disciplinary

proceedings on behalf of the Palestinian Authority, its law enforcement branches or its agencies, of any individuals for carrying out terror attacks against the State of Israel or Israeli citizens.

55. Please describe fully the disposition, sentence, verdict, resolution, plea agreement or judicial outcome of any trial, prosecution, hearing or disciplinary proceedings conducted by the Palestinian Authority, its law enforcement branches or its agencies of any individual for carrying out terrorist activities against the State of Israel or Israeli citizens.

56. Please describe the process that imprisoned, detained or sentenced individuals in the Palestinian Authority's penal facilities undertake in order to gain parole, clemency, pardons, sentence reduction or early release from incarceration.

57. Please describe the body, agency, bureau or individuals that review, determine, recommend, grant or deny such requests for non-judicial release from incarceration.

58. Please state the criteria employed by any body, agency, bureau or individual referred to in the previous answer, in analyzing and deciding upon such requests for non-judicial release from incarceration.

59. Please state the names of and dates that all individuals sentenced and imprisoned by the Palestinian Authority for terrorist attacks against Israel or Israeli citizens who have been granted parole, clemency, pardons, sentence reduction or early release.

60. For each account in the United States under the control and/or direction of the Palestinian Authority, one of its instrumentalities, agencies, and/or subdivisions, please state:

- a. the exact name and address of each bank, depository and/or investment firm;
- b. The balance in those accounts as of the date of the service of the summons in this action;
- c. the current balance;
- d. if there is any difference between your answers to (b) and (c) above, specify when the withdrawals were made, who received the benefit of the withdrawal, and where the proceeds of the withdrawals went;
- e. the exact name and address in which each account is registered, account numbers, and the present location and custodian of the deposit books, check registers, statements and/or certificates;
- f. if the account is registered in an entity other than the Palestinian Authority, state the exact relationship between the Palestinian Authority and the entity.

61. Regarding any other asset (real estate, security, stock, bond, commodity, business enterprise, etc.) in which the Palestinian Authority, one of its instrumentalities, agencies, and/or subdivisions has an interest in the United States not disclosed in the previous interrogatory, please describe in detail:

- a. exact nature and description of the asset;

- b. location;
- c. current value;
- d. exact title holder.

62. Please state each and every legal action and/or lawsuit in which the Palestinian Authority has been a party (either plaintiff or defendant) including:

- a. name and address of plaintiff;
- b. name and address of defendant;
- c. name of court in which the action was filed;
- d. file number;
- e. nature of litigation;
- f. outcome.

63. Please state whether the Palestinian Authority granted a license to Hasan Salameh to carry, own and/or possess a weapon and, if so, please state:

- a. date of issuance;
- b. the individual and/or agency granting said license;
- c. the reason for the issuance of said license.

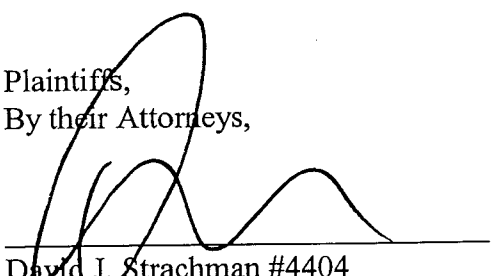
64. Please describe and identify all documents utilized in answering Plaintiffs' First Set of Interrogatories.

65. For each witness you intend to present at trial, please state:

- a. Their name;
- b. Their address;
- c. The sum and substance of their anticipated testimony,

66. Please provide a list of all documents you intend to introduce at trial.

Plaintiffs,
By their Attorneys,



David J. Strachman #4404
McIntyre, Tate, Lynch & Holt.
321 South Main Street, Ste. 400
Providence, RI 02903
(401) 351-7700

CERTIFICATION

I hereby certify that on the 24 day of January, 2002, I mailed a true copy of the within

to:

Ramsey Clark, Esquire
Lawrence W. Schilling, Esquire
36 East 12th Street
New York, NY 10003

Deming E. Sherman
Edwards & Angell, LLP
2800 Bank Boston Plaza
Providence, RI 02903

A handwritten signature in cursive script, appearing to read "Joanna R. Sullivan", is written over a horizontal line.